



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

July 18, 2021

Community Board 2, Manhattan
via email: sohonoho@cb2manhattan.org

Re: SoHo/NoHo Neighborhood Plan

The National Trust for Historic Preservation¹ appreciates the opportunity to offer comments to Manhattan Community Board 2 regarding the proposed “SoHo/NoHo Neighborhood Plan,” the first major comprehensive land-use revision to affect these iconic neighborhoods in 50 years.

The National Trust supports the thoughtful modernization of zoning in SoHo and NoHo in ways that would create affordable housing, allow a wider range of commercial and residential uses, and support the creative community. However, we strongly oppose this proposed upzoning that would risk destroying the world-famous and irreplaceable architectural fabric of these intact 19th and early 20th century cast-iron, brick, and limestone industrial and commercial districts.

The “SoHo/NoHo Neighborhood Plan” proposes a dramatic increase in FAR that would impact a 56-block, 146-acre project area—80 percent of which overlaps the boundaries of 4 historic districts including the SoHo Cast Iron Historic District. According to our local partners at the Municipal Art Society, the most recent September 2020 MapPluto data shows there are approximately 2.5 million square feet of development rights currently available within the rezoning area. Unfortunately, the proposed upzoning would more than triple this amount to nine million square feet, of which six million would be located within the historic districts.

Like many local residents, the National Trust is deeply concerned that a massive increase in development rights, if approved, would result in proposals out of context with the existing scale, height, and density of these historic neighborhoods. This could result in yet more luxury apartments, with a limited affordable housing component, and potentially push out long-term tenants. It is also disconcerting that the rezoning area’s boundaries are so closely aligned with this concentration of historic districts. The proposed upzoning will result in intense pressure on the Landmarks Preservation Commission to approve out-of-scale development proposals within the historic districts.

¹ The National Trust for Historic Preservation in the United States is a private nonprofit organization chartered by Congress in 1949 to “facilitate public participation” in the preservation of our nation’s heritage, and to further the historic preservation policy of the United States. See 54 U.S.C. § 312102(a). With more than one million members and supporters around the country, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.



Given the potentially disastrous impacts of the “SoHo/NoHo Neighborhood Plan,” we are urging the Department of City Planning to work with the Landmarks Preservation Commission and Community Board 2 to conduct a preservation-based analysis identifying the best sites for redevelopment and to calibrate upzoning to encourage projects in those locations. We also recommend DCP develop design guidelines in partnership with LPC and the community to inform future development within the historic districts. The analysis and guidelines will lessen the burden on the LPC and give clarity to the community and, importantly, to developers as proposals are conceived.

The National Trust absolutely agrees that we must increase affordable housing throughout the United State and especially within our cities. The nation’s housing crisis is a complex problem that lacks a single answer and requires a broad mix of strategies to solve through regulations and subsidies at the local, state, and federal level. Cities across the nation are benefiting from collaborative efforts to create affordable housing and to protect and repurpose historic buildings by measures such as reducing the threshold for affordable housing in new construction to allow for more units, encouraging Accessory Dwelling Units (ADUs), and supporting well-designed infill construction.

In addition, valuable tax incentives such as the federal historic tax credit (“HTC”) help drive down the cost of housing and have increased the availability of low- and moderate-income housing units. In cities across the nation, federal HTCs are used in combination with many other incentives including the Low Income Housing Tax Credit (“LIHTC”). Since the HTC was established, the number of low- and moderate-income housing units created using this tax incentive is well over 166,000 units. And, while this number is modest relative to the overall need for more affordable housing, the potential to grow the number of affordable housing units in historic buildings through legislative enhancements is significant.²

The SoHo/NoHo neighborhoods are a paradigm for the revitalization and preservation of a formerly industrial district into a thriving multi-use neighborhood, influencing similar efforts around the country and the world. These neighborhoods are not somehow “frozen in time” by historic district designation. They are living, breathing swaths of the city. As the zoning is modernized, it would be wise for the City—SoHo’s steward—to protect and celebrate this remarkable success story while also ensuring more equity and affordability for all New Yorkers. The National Trust urges Community Board 2 to vote in opposition to the SoHo/NoHo Neighborhood Plan.

² Bipartisan federal legislation, the Historic Tax Credit Growth and Opportunity Act (“HTC-GO”), is pending introduction in the House and Senate. Enacting HTC-GO would make historic preservation projects even more attractive to affordable housing developers and eliminate the current impediment that results when combining these two incentives. The National Trust is currently advocating for this legislation on Capitol Hill.